#### Message

From: Strum, Madeleine [Strum.Madeleine@epa.gov]

**Sent**: 7/26/2017 6:57:13 PM

To: Louis, Egide [Louis.Egide@epa.gov]
CC: Smith, Darcie [Smith.Darcie@epa.gov]

Subject: RE: 2014 NATA Review: Kentucky Additional January 2017

### Ex. 5 Deliberative Process (DP)

Madeleine Strum | U.S. Environmental Protection Agency | 109 TW Alexander Drive, RTP, NC 27711
Office of Air Quality Planning and Standards | Air Quality Assessment Division | Emission Inventory and Analysis Group | 919 541 2383

Mailing Address: US EPA OAQPS (C339-02)/ RTP, NC 27711

From: Louis, Egide

**Sent:** Wednesday, July 26, 2017 1:37 PM

To: Strum, Madeleine

Subject: RE: 2014 NATA Review: Kentucky Additional January 2017

## Ex. 5 Deliberative Process (DP)

Thanks,

Egide

From: Strum, Madeleine

**Sent:** Thursday, July 20, 2017 11:33 PM **To:** Louis, Egide < <u>Louis.Egide@epa.gov</u>>

Subject: RE: 2014 NATA Review: Kentucky Additional January 2017

## Ex. 5 Deliberative Process (DP)

Madeleine Strum | U.S. Environmental Protection Agency | 109 TW Alexander Drive, RTP, NC 27711
Office of Air Quality Planning and Standards | Air Quality Assessment Division | Emission Inventory and Analysis Group | 919 541 2383

Mailing Address: US EPA OAQPS (C339-02)/ RTP, NC 27711

From: Louis, Egide

Sent: Thursday, July 20, 2017 11:27 PM

To: Strum, Madeleine < Strum. Madeleine@epa.gov>

Subject: RE: 2014 NATA Review: Kentucky Additional January 2017

## Ex. 5 Deliberative Process (DP)

From: Strum, Madeleine

**Sent:** Thursday, July 20, 2017 11:23 PM **To:** Louis, Egide < Louis. Egide@epa.gov>

Subject: FW: 2014 NATA Review: Kentucky Additional January 2017

# Ex. 5 Deliberative Process (DP)

Madeleine Strum | U.S. Environmental Protection Agency | 109 TW Alexander Drive, RTP, NC 27711
Office of Air Quality Planning and Standards | Air Quality Assessment Division | Emission Inventory and Analysis Group | 919 541 2383

Mailing Address: US EPA OAQPS (C339-02)/ RTP, NC 27711

From: Strum, Madeleine

Sent: Friday, July 14, 2017 7:39 AM

To: 'Margaret.Hunter@ky.gov' < Margaret.Hunter@ky.gov>

Cc: Louis, Egide < Louis. Egide@epa.gov >; Palma, Ted < Palma. Ted@epa.gov >

Subject: FW: 2014 NATA Review: Kentucky Additional January 2017

Thank you. Does this mean the emissions were reviewed and are correct? Or are you still following up with the facility? I am still working on the point changes so it is not too late to get them in-I would just need to know a timeframe.

Madeleine Strum | U.S. Environmental Protection Agency | 109 TW Alexander Drive, RTP, NC 27711
Office of Air Quality Planning and Standards | Air Quality Assessment Division | Emission Inventory and Analysis Group | 919 541 2383

Mailing Address: US EPA OAQPS (C339-02)/ RTP, NC 27711

From: Hunter, Margaret (EEC) [mailto:Margaret.Hunter@ky.gov]

**Sent:** Thursday, July 13, 2017 1:45 PM **To:** Louis, Egide < Louis. Egide@epa.gov>

Cc: Melissa Duff < melissa.duff@ky.gov>; Strum, Madeleine < Strum.Madeleine@epa.gov>

Subject: RE: 2014 NATA Review: Kentucky Additional January 2017

Hi Egide,

I don't have any updates at this time.

Thanks,

#### Margaret Hunter

**Environmental Control Supervisor** 

Kentucky Division for Air Quality Emissions Inventory Section 502-782-6664

From: Louis, Egide [mailto:Louis.Egide@epa.gov]

**Sent:** Wednesday, July 12, 2017 8:58 AM

To: Hunter, Margaret (EEC) < Margaret. Hunter@ky.gov>

Cc: Duff, Melissa K (EEC) <melissa.duff@ky.gov>

Subject: RE: 2014 NATA Review: Kentucky Additional January 2017

Hi Margatet:

Did you get a chance to look into 2014 EO emissions from Monument Chemical Kentucky LLC? (see correspondence below).

Thanks, Egide

From: Strum, Madeleine

Sent: Monday, July 03, 2017 7:37 AM

To: Hunter, Margaret (EEC) < Margaret. Hunter@ky.gov>

Cc: Louis, Egide <Louis.Egide@epa.gov>; Melissa Duff <melissa.duff@ky.gov>

Subject: RE: 2014 NATA Review: Kentucky Additional January 2017

Hi Margaret,

Do you have any updates on Monument Chemical Kentucky LLC? Are you still looking into the emission factors? I think that is where we left off on this facility- please correct me if I'm off track on this one.

#### Thanks!

Madeleine Strum | U.S. Environmental Protection Agency | 109 TW Alexander Drive, RTP, NC 27711
Office of Air Quality Planning and Standards | Air Quality Assessment Division | Emission Inventory and Analysis Group | 919 541 2383

Mailing Address: US EPA OAQPS (C339-02)/ RTP, NC 27711

From: Strum, Madeleine

Sent: Tuesday, June 06, 2017 12:02 PM

To: 'Hunter, Margaret (EEC)' < Margaret. Hunter@ky.gov>

Cc: Louis, Egide < Louis. Egide@epa.gov >; Melissa Duff < melissa.duff@ky.gov >; NATA < NATA@epa.gov >

Subject: RE: 2014 NATA Review: Kentucky Additional January 2017

#### Margaret,

Thanks for the explanation. I am happy to extend that comment to all records within each facility. You don't have to send me anything. I just wanted to clarify and sorry I missed that you had it on the first line of each facility.

I've not yet looked at the release point changes so I may have some follow up questions there. I hope to get to this tomorrow.

Please keep Egide and me posted on the what you find out on the EF for ethylene oxide emissions for Monument Chemical Kentucky LLC.

Madeleine Strum | U.S. Environmental Protection Agency | 109 TW Alexander Drive, RTP, NC 27711
Office of Air Quality Planning and Standards | Air Quality Assessment Division | Emission Inventory and Analysis Group | 919 541 2383

Mailing Address: US EPA OAQPS (C339-02)/ RTP, NC 27711

From: Hunter, Margaret (EEC) [mailto:Margaret.Hunter@ky.gov]

Sent: Tuesday, June 06, 2017 11:20 AM

To: Strum, Madeleine < Strum. Madeleine@epa.gov>

Cc: Louis, Egide <Louis.Egide@epa.gov>; Melissa Duff <melissa.duff@ky.gov>; NATA <NATA@epa.gov>

Subject: RE: 2014 NATA Review: Kentucky Additional January 2017

Hi Madeleine,

For Endeavor Energy Resources LP, EQT Gathering - Maytown Compressor Station, Metalsa Structural Products, these three facilities were setup incorrectly in our database. With an initial application, the actual emissions should be entered with zeroes. However in these 3 cases, instead of zero tons for the actual emissions, the maximum rated capacity of the units operated at 8760 hours was entered, therefore the actual emissions were equal to potential-to-emit emissions. None of these facilities meet our annual survey criteria, so we do not have any actual emissions data to report. That's why we're requesting that the emissions be deleted.

I realize that my comment "Delete emissions: data entry errors when this {minor/registered} source was created in the database. Source does not meet annual emissions survey criteria so actual emissions data is not available." was only entered on the first line of the facility as it was listed on the ChgProcess\_Additional\_Jan2017 spreadsheet. So maybe when you added some filters or did something else that it looked like there was no rationale for the change. Please let me know how I should report these comments for future NATA reviews to prevent any confusion.

Similarly, for McKechnie Vehicle Components, the comment "Delete emissions, plating process removed in 2014" was added to Chromium III for agy\_unit\_id: 033. One of the plating processes (unit 033) was removed in 2014. So all of the emissions associated with unit 033 should be deleted.

Thank you for the additional information with regards to the HAP emissions from the Salt Cake Cooling plant at Real Alloy Recycling. I will review it and let you know as soon as I can about how to treat the data.

Thanks,

#### Margaret Hunter

**Environmental Control Supervisor** 

Kentucky Division for Air Quality Emissions Inventory Section 502-782-6664

From: Strum, Madeleine [mailto:Strum.Madeleine@epa.gov]

Sent: Tuesday, June 06, 2017 9:58 AM

To: Hunter, Margaret (EEC) < Margaret. Hunter@ky.gov>

Cc: Louis, Egide <Louis.Egide@epa.gov>; Duff, Melissa K (EEC) <melissa.duff@ky.gov>; NATA <NATA@epa.gov>

Subject: RE: 2014 NATA Review: Kentucky Additional January 2017

#### Margaret,

I attach a report of chromium emissions in the 2014NEIv1 for facilities with either the same facility type or same NAICS as Real Alloy Recycling Inc. I hope this is helpful. Can you answer my below question (item 1) as I'd like to be able to implement these changes as soon as possible.

#### **Thanks**

Madeleine Strum | U.S. Environmental Protection Agency | 109 TW Alexander Drive, RTP, NC 27711.

Office of Air Quality Planning and Standards | Air Quality Assessment Division | Emission Inventory and Analysis Group | 919 541 2383

Mailing Address: US EPA OAQPS (C339-02)/ RTP, NC 27711

From: Strum, Madeleine

**Sent:** Monday, June 05, 2017 3:46 PM

To: 'Hunter, Margaret (EEC)' < Margaret. Hunter@ky.gov>

Cc: Louis, Egide <Louis.Egide@epa.gov>; Melissa Duff <melissa.duff@ky.gov>; NATA <NATA@epa.gov>

Subject: RE: 2014 NATA Review: Kentucky Additional January 2017

#### Hi Margaret

Thanks for the changes. I've tagged out the chromium you submitted for Modern Plating Coatings & Finishes LLC per your comments. Have you heard from Monument Chemical Kentucky LLC about the ethylene oxide emissions?

#### A few additional follow up items

- 1) You have quite a few changes to "0" emissions without any rationale. For example: Endeavor Energy Resources LP, EQT Gathering LLC Maytown Compressor Station, Metalsa Structural Products Inc, Mckechnie Vehicle Components. Should they all have this comment: "Delete emissions: data entry errors when this registered source was created in the database. Source does not meet annual emissions survey criteria so actual emissions data is not available."
- 2) With regards to the first excel sheet you had a question on

			EIS	Real			EIS	KY	KY	
			facility	Alloy	KY Agency	EIS unit	process	Agency	Agency	
			id:	Recycling	ID:	id:	id:	unit id:	process	SCC:
Kentucky	21031	Butler	7429611	Inc	2103100033	9206413	38785614	007	id: 1	30499999

<sup>&</sup>quot;Can't verify where calculations came from. Does EPA have a similar source that can confirm metal HAPs presence in Salt Cake Cooling Plant?" I will run report of chromium from facilities with similar NAICS - I'll let you know what I get.

#### **Thanks**

Madeleine Strum | U.S. Environmental Protection Agency | 109 TW Alexander Drive, RTP, NC 27711
Office of Air Quality Planning and Standards | Air Quality Assessment Division | Emission Inventory and Analysis Group | 919 541 2383

Mailing Address: US EPA OAQPS (C339-02)/ RTP, NC 27711

From: Hunter, Margaret (EEC) [mailto:Margaret.Hunter@ky.gov]

Sent: Thursday, June 01, 2017 2:43 PM

To: Strum, Madeleine < Strum. Madeleine@epa.gov>

Cc: Louis, Egide <Louis.Egide@epa.gov>; Melissa Duff <melissa.duff@ky.gov>

Subject: 2014 NATA Review: Kentucky Additional January 2017

Ms. Strum,

Attached are comments on the January 2017 analysis of the 2014 NATA review for the Commonwealth of Kentucky. Also attached are comments on Monument Chemical Kentucky LLC and Modern Plating Coatings & Finishes LLC.

If you have any questions, please let me know.

Thanks,
Margaret Hunter
Environmental Control Supervisor

Kentucky Division for Air Quality Emissions Inventory Section 300 Sower Blvd Frankfort, KY 40601 502-782-6664